

ORIGINAL

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



MARCUS I. WASHINGTON,

Plaintiff,

v.

UNITED STATES OF AMERICA, STATE OF NEW YORK, CITY OF  
NEW YORK, JOE BIDEN, DONALD TRUMP, KAMALA HARRIS,  
KATHY HOCHUL, ANDREW CUOMO, ERIC ADAMS, BILL  
DEBLASIO, NATIONAL INSTITUTES OF HEALTH, NATIONAL  
INSTITUTE OF ALLERGY AND INFECTIOUS DISEASES, FOOD &  
DRUG ADMINISTRATION, CENTER FOR DISEASE CONTROL &  
PREVENTION, ANTHONY FAUCI, BILL GATES, BILL & MELINDA  
GATES FOUNDATION, PFIZER, MODERNA, JOHNSON &  
JOHNSON, DEPARTMENT OF EDUCATION, LAUREN NUMEROFF,  
ALEXANDER ARTZ, NEW YORK CITY DEPARTMENT OF  
EDUCATION, UNITED FEDERATION OF TEACHERS, JEANIE  
SANTOPEITRO, MARK COLLINS, MICHAEL HERRON,  
UNIVERSITY OF MIAMI, EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION, RICHARD BUCKLEY, CHRISTIANA DORIETY,  
WILLIAM MORRIS ENDEAVOR ENTERTAINMENT, LLC; formerly  
known as the WILLIAM MORRIS AGENCY, ESTATE OF ROBERT  
P. PATTERSON, PETER KEVIN CASTEL, LORETTA A. PRESKA,  
SOUTHERN DISTRICT OF NEW YORK, SECOND CIRCUIT,  
SUPREME COURT, LOEB & LOEB LLP, MICHAEL P. ZWEIG,  
CHRISTIAN CARBONE, SONNENSCHN NATH & ROSENTHAL  
LLP, AMERICAN ARBITRATION ASSOCIATION, TIMOTHY K.  
LEWIS, SCHNADER HARRISON SEGAL & LEWIS LLP, et al.

Defendants.

23-CV-5312-EK-RER

Civil Action No. \_\_\_\_ CIV \_\_\_\_

PRO SE COMPLAINT

**DEMAND FOR EXPEDITED DISCOVERY AND JURY TRIAL, OR IN THE ALTERNATIVE, GRANT DEFAULT JUDGMENT ON  
CLAIMS AGAINST DEFENDANTS WILLIAM MORRIS ENDEAVOR ENTERTAINMENT, LOEB & LOEB LLP, P. KEVIN CASTEL,  
DEPARTMENT OF EDUCATION, UNITED FEDERATION OF TEACHERS, AND THE EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION**

Plaintiff Marcus I. Washington (or "Mr. Washington"), as and for his Complaint in this action against Defendants United States of America, State of New York, City of New York, Joe Biden, Donald Trump, Kathy Hochul, Andrew Cuomo, Eric Adams, Bill DeBlasio, Congress, Supreme Court, Central Intelligence Agency (hereinafter referred to as "CIA"), National Institutes of Health (hereinafter referred to as "NIH"), Anthony Fauci, National Institute of Allergy and Infectious Diseases (hereinafter referred to as "NIAID"), Food & Drug Administration (hereinafter referred to as "FDA"), Center for Disease Control & Prevention (hereinafter referred to as "CDC"), Bill Gates, Bill & Melinda Gates Foundation, Pfizer, Moderna, Johnson & Johnson, Department of Education, New York City Department of Education, United Federation of Teachers, University of Miami, Equal Employment Opportunity Commission, Richard Buckley, Christiana Doriety, William Morris Endeavor Entertainment,

LLC, formerly known as the William Morris Agency, LLC, (hereinafter referred to as either "The Company" or "William Morris" or "WMA" or "WME Entertainment"), P. Kevin Castel, Loeb & Loeb LLP, Michael P. Zweig, Christian Carbone, Sonnenschein Nath & Rosenthal LLP, American Arbitration Association, Timothy K. Lewis, Schnader Harrison Segal & Lewis LLP, et al. hereby alleges as follows:

### NATURE OF CLAIMS

1. This is an action for declaratory, injunctive and equitable relief, as well as monetary damages, to redress the unlawful actions of the various Defendants named above, which include but are not limited to genocide, conspiracy to deprive African Americans and all hue-mans of their unalienable, human, constitutional and civil rights under the color of law, intentional violations of the U.S. Constitution, fraud, intentional violations of the Ku Klux Klan Act of 1871, intentional violations of 1981 of the Civil Rights Act of 1866, 42 U.S.C. § 1981 ("Section 1981"), Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e *et seq.* ("Title VII"), the New York State Human Rights Law, New York Executive Law §§ 296 *et seq.* (the "NYSHRL"), and the New York City Human Rights Law, New York Administrative Code §§ 8-107 *et seq.* (the "NYCHRL"), intentional violations of the Sherman & Donnelly Acts, defamation, libel, intentional violations of the Judicial Code of Conduct, intentional violations of Oath of Office, intentional violations of New York Judiciary Law § 487 and unjust enrichment to name a few.

### JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1343 as this action involves federal questions regarding the deprivation of Plaintiff's rights under Section 1981 and Title VII. The Court has supplemental jurisdiction over Plaintiff's related claims arising under state and local law pursuant to 28 U.S.C. § 1367(a).

3. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to this action, including the unlawful employment practices alleged herein, occurred in this district.

### PROCEDURAL REQUIREMENTS

4. Mr. Washington filed a charge of discrimination against DEFENDANT NYCDOE with the Equal Employment Opportunity Commission ("EEOC") alleging violations of Title VII, 42 U.S.C. §§ 2000e *et seq.* on \_\_\_\_\_. The charges arise out of the same facts alleged herein, in addition to discrimination on the basis of color and perceived national origin.

5. On April 10, 2023, the Equal Employment opportunity Commission issued a Notice and Right to Sue letter to Mr. Washington, stating that they would not complete their investigation into his claims of race, color and sex discrimination claims against his former employer, the New York City Department of Education. *See Exhibit A.*

6. On May 9, 2023, PLAINTIFF Mr. Washington submitted an appeal and to this date, no response has been provided by DEFENDANT EEOC.

7. Since DEFENDANTS DOE, UFT and EEOC intentionally refused to uphold our nation's antidiscrimination laws and/or refused to issue an impartial decision on the merits and wasted a significant amount of PLAINTIFF Mr. Washington's time, PLAINTIFF Mr. Washington now seeks to stay the filing deadline imposed by the Civil Rights Act of 1964 against DEFENDANT NYCDOE and allow him to amend his complaint following the issuance of their decision, as well as those by DEFENDANTS UFT and DOE.

8. Any and all other prerequisites to the filing of this suit have been met

### **FACTUAL ALLEGATIONS**

#### **I. A History of Educational Racism in the United States of America**

9. Efforts to maintain my black inferiority, including religion, education and entertainment to name a few.
10. During slavery, most African slaves were banned from reading.
11. After slavery was outlawed and the 13-15th Amendments were passed, white resistance to equality resulted in a period known as Jim Crow semi-slavery.
12. During this period, federal and state governments passed laws to keep the "races" segregated.
13. In Brown v. Board of Education (1954), the Supreme Court seem "separate but equal" to be unconstitutional.
14. Passage of the Civil Rights Act of 1964.
15. The largest school district in the United States of America is DEFENDANT NYC DOE, located in DEFENDANT City of New York.

#### **II. Complaint Against NYC DOE [Crimes Against Humanity, Genocide, Intentional Violations of Unalienable, Human, Constitutional and Civil Rights, Fraud, Conspiracy, Intentional Violation of the Ku Klux Klan Act of 1871, Defamation, Libel, Unjust Enrichment, Intentional Violations of Section 1981, Title VII, NYSHRL, NYCHRL, etc.]**

##### **A. Systemic Disparate Treatment**

16. Studies showing discrimination in hiring based on names sounding "black."
17. As a result of on-going hiring discrimination, African Americans account for less than \_\_\_\_ of teachers throughout the U.S.
18. Throughout majority of states in DEFENDANT United States of America, one must be licensed to be employed as a teacher.
19. For the small number of African Americans hired as teachers, many face discriminatory treatment and microaggressions once employed, causing many leave the profession at faster rates than their similarly situated "white" counterparts.

**B. Systemic Disparate impact**

20. Throughout majority of states in DEFENDANT United States of America, one must be licensed to be employed as a teacher.

21. Racist origins of requiring licenses for jobs.

22. In *Gulino v Board of Education* three teachers filed the lawsuit in 1996 against the city and state education departments claiming that the mandated certification tests—the National Teacher Examination (NTE) and its successor the Liberal Arts & Sciences Test (LAST) — had a “disparate impact on African-American and Latino test takers.”

23. As reported by Gothamist writer Sophia Chang on November 19 2020 she states: “A massive decades-long lawsuit against New York City over the use of two teaching certification tests is winding to a conclusion with nearly \$660 million and pension benefits in damages awarded to plaintiffs in the class action lawsuit claiming the tests were discriminatory against Black and Latino teachers and prevented them from achieving full seniority pay and benefits. The city could be further liable for hundreds of millions of dollars more in damages yet to be determined with an estimated maximum payout of about \$1.8 billion for the 4700 plaintiffs in the...class action suit — in what city officials say is the highest amount of damages that New York City has ever paid.”

24. Lawsuit against DEFENDANT NYCDOE and multi-million dollar settlement.

25. Current lawsuit concerning the same issue.

**C. Genocidal Impact of Racially Segregated Workforce/Student Population on African Americans**

26. Most children in the U.S. attend public school from Pre-K to 12th grade or about 14 years.

27. The average school day in the U.S. is \_\_\_\_ hours long.

**i. Indoctrination Leads to Double Consciousness and Mental Enslavement**

28. Whitewashing history to perpetuate the myth of “white racial superiority.”

29. Race is a social and legal construct — not a biological reality.

30. Since race is not a biological reality, racism is a learned behavior not grounded in truth or scientific fact.

31. It cannot be disputed that archeological evidence supports that original man and woman were dark-skinned and born on the continent now known as Africa — thus meaning that everyone alive today is a descendant of black people.

**ii. School to Prison Pipeline**

32. Throughout majority of states in DEFENDANT United States of America, one must be licensed to be employed as a teacher.

**iii. Disparate Outcomes in Graduation Rates Between “Whites” and African Americans**

33. Throughout majority of states in DEFENDANT United States of America, one must be licensed to be employed as a teacher.

iv. Disparate Outcomes in College Admissions Between “Whites” and African Americans

34. Throughout majority of states in DEFENDANT United States of America, one must be licensed to be employed as a teacher.

v. Current Lawsuit filed against DEFENDANT NYCDOE by African American and Hispanic Students

35. Filed on behalf of students of color in March of 2021, this complaint "claims New York City's education system is racist in design and operation — effectively separating largely white and Asian students from Black and Latino students through a discriminatory testing processes for its gifted and talented (G&T) programs and curriculum. There are eight specialized high schools throughout NYC."

36.

D. Pre and Post-Hiring Individual Disparate Treatment Against PLAINTIFF Mr. Washington

i. Background on PLAINTIFF Mr. Washington

37. PLAINTIFF Mr. Washington is American born citizen of African descent.

38. PLAINTIFF Mr. Washington attended public schools in the states of Georgia and Florida.

39. For the entirety of PLAINTIFF Mr. Washington's childhood and teenage years, he excelled academically in all of his classes.

40. At no point during his public school education (K-12th) were any of his core academic teachers.

41. PLAINTIFF Mr. Washington graduated from high school with honors and was awarded more than \$100,000 in scholarships and grants to attend DEFENDANT University of Miami.

42. Prior to teaching, PLAINTIFF Mr. Washington worked numerous jobs throughout the entertainment industry, both at the corporate and non-corporate levels.

ii. Teaching Experiences From 2015-2020

43. Between December 2015 to October 2021, PLAINTIFF Mr. Washington was employed as a substitute teacher by DEFENDANT NYC DOE.

44. On at least two separate occasions, PLAINTIFF Mr. Washington applied for DEFENDANT NYCDOE's Men Teach program.

45. Despite teaching for DEFENDANT NYCDOE, PLAINTIFF Mr. Washington did not make it pass the first round for the first round and made it to the second round the second year.

46. By the beginning of the 2020-2021 school year, PLAINTIFF Mr. Washington had accumulated the 30 graduate credits that was required by DEFENDANT NYCDOE for substitute teachers who worked over a certain amount of days to continue teaching each year (6 credits per year).

47. Objectively speaking, PLAINTIFF Mr. Washington was qualified to teach his own class and many of the teachers and educators he worked with praised his skills and classroom management.

iii. 2020-2021 Academic School Year

48. For majority of the 2020-2021 school year, PLAINTIFF Mr. Washington taught in person at P.S. 250 located in his neighborhood of Williamsburg (Brooklyn).

49. Racial demographics of P.S. 250's student population. (Majority Hispanic, Asian and Black).

50. Children are not only taught English, but students in Kindergarten are taught Mandarin as well.

51. At the time, the principal of the school was Amott and the vice principal was Rosecindy and they'd both been working at the school for some time.

52. Both Amott and Rosecindy are women classified as "white" who lived Long Island.

53. Since the school was short staffed due to COVID, Amott immediately asked PLAINTIFF Mr. Washington on his first day if he was interested in accepting a long term position at the school for the remainder of the year to which he agreed.

54. Amott placed PLAINTIFF Mr. Washington in a third grade ICT class as a co-teacher.

55. PLAINTIFF Mr. Washington was fully committed to the job and made a positive impact on the students in the class.

56. Although PLAINTIFF Mr. Washington's co-teacher struggled adapting to technological shifts COVID brought to teaching (e.g. Zoom) and was behind in teaching her lessons, she spent a lot of time trying to micromanage the plaintiff.

57. PLAINTIFF Mr. Washington sought for Amott to intervene to which she never did aside from observing us teach.

58. As the problem worsened, PLAINTIFF Mr. Washington went to vice principal Rosecindy and the three of them had a meeting which at one point, resulted in the co-teacher getting up out of her seat and pushing tables around while crying.

59. Prior to this incident, Amott spoke to PLAINTIFF Mr. Washington about possibly leading his own third grade class due to the possible enrollment of more in-person students.

60. In the interim, Amott decided to move PLAINTIFF Mr. Washington to co-teach in a fifth grade ICT class.

61. The co-teacher in this class had just recently been hired and struggled with classroom management.

62. Many of the students in the class were below grade level and struggled in reading, writing and math.

63. Embarrassingly, two of the top students in class had just arrived to the country.

64. PLAINTIFF Mr. Washington immediately made changes to the classroom that allowed his co-teacher to actually teach lessons without being disrupted and allowed students to actually learn and attempt to complete assignments in class.

65. Two weeks into the class, PLAINTIFF Mr. Washington received a complaint from a parent about the increase in homework that was being assigned.

66. She made the matter about herself, stating that she was a single mother who worked in a hospital and was exhausted by the time home and didn't want to spend time reviewing her daughter's work.

67. PLAINTIFF Mr. Washington explained that majority of the assignments were started on in class and if not finished, had to be completed for homework, amongst other things but the mother did not care.

68. The mother complained to Amott who then immediately moved me to co-teach in a first grade ICT class.

69. PLAINTIFF Mr. Washington was already familiar with the students in this class because he watched them a couple days a week during their lunch period.

70. Their behavior with PLAINTIFF Mr. Washington and his first year co-teacher (a woman classified as "white") was night and day.

71. For the entire year, his co-teacher struggled to gain the respect of the students and they walked all over her, sometimes even making her cry.

72. PLAINTIFF Mr. Washington's co-teacher informed him that she'd been asking Amott for months to have a co-teacher and that recently, one of the students threaten to kill another student, which resulted in an additional adult being added to the classroom.

73. Following the winter break, Amott was noticeably absent from the school between February and June of 2021.

74. Part of the reason for Amott's absence was that although she was vaccinated, she contracted COVID-19.

75. Towards the close of the school year, Amott sent out an email asking the staff if they were interested in teaching summer school, which was now being referred to as the "Summer Rising" program.

76. PLAINTIFF Mr. Washington expressed interest in working and was offered a teaching position.

i. Unlawful Termination from P.S. 250

77. The Summer Rising program was broken up into two parts: 1. An academic portion which lasted from 8am-12pm and 2. A summer camp portion which lasted from 12pm-6pm.



78. Weeks into teaching, PLAINTIFF Mr. Washington was informed by acting principal Budhu that a parent had complained about her daughter having to do classwork because she was in "summer camp."

79. In addition to Amott and Rosecindy, acting principal Budhu was also present in the meeting.

80. It was not until after the meeting ended and PLAINTIFF Mr. Washington was about to exit the school's doors, that Budhu informed him that he'd been accused of engaging in "corporeal punishment."

81. PLAINTIFF Mr. Washington was shocked because at no point during his time at P.S. 250 did he put his hands on a student.

82. PLAINTIFF Mr. Washington went home and immediately sent his union, DEFENDANT UFT a complaint addressing the events which led to his termination.

83. A day after filing a complaint against Amott and P.S. 250, Amott announced her resignation from P.S. 250 and that she had accepted a principal position at an elementary school in Long Island.

84. Although accused of "corporeal punishment," PLAINTIFF Mr. Washington was still allowed to continue working for DEFENDANT NYCDOE and landed a teaching job the next day at a middle school on Manhattan.

**i. Unlawful Termination from DEFENDANT NYCDOE**

85. During the 2021-2022 academic school year, PLAINTIFF Mr. Washington landed a long-term assignment at a high school in Williamsburg (Brooklyn).

86. After allowing unvaccinated teachers and educators to work in-person during the first year of the COVID-19 "pandemic," DEFENDANT NYCDOE decided to mandate the COVID-19 vaccine for all employees beginning October \_\_, 2021.

87. Due to DEFENDANT United States of America's history of medical racism, including the use of vaccines, African Americans as a group were the most likely to be vaccine hesitant.

88. The three main manufacturers of COVID-19 vaccines in the U.S. are DEFENDANTS Pfizer, Moderna and Johnson & Johnson.

89. DEFENDANT Moderna is co-owned by DEFENDANT Anthony Fauci, former Director of DEFENDANT NIAID for more than 30 years.

90. Percentage of African Americans vaccinated in the City of New York.

91. Although the COVID-19 vaccine and mask mandates ended in the State and City of New York on Monday, March 7, 2022, DEFENDANT NYCDOE required its teachers and staff to be vaccinated as a condition of employment until [insert date].



92. Elected officials like DEFENDANTS Hochul and Harris falsely proclaimed, like the Pope, that the unsafe and ineffective vaccine was a gift from God.

93. No one can be "fully" vaccinated.

94. Natural immunity is stronger than artificially induced immunity.

**E. Additional Human Rights Violations**

**i. Vaccine Mandates**

95. Throughout history, DEFENDANT United States of America, including its government and various institutions, organizations and agencies like DEFENDANTS NIH, NIAID, CDC, FDA, HHS and others, have advocated that vaccines are "safe and effective" and are the reason why viral outbreaks during the 1800s and 1900s are a thing of the past.

96. Over the last 30 years, children have been required to \_\_\_\_\_ [increases in the vaccine schedule since the 1990s].

97. Substantial scientific studies have shown that vaccines are not "safe and effective," contain harmful ingredients like mercury, aluminum and human fetal tissue, and are a contributing factor in the increase in autism and other emotional and behavioral disorders seen in vaccinated children throughout the U.S.

98. Substantial scientific studies also support that the MMR vaccine negatively effects African American male children differently than it does other ethnic groups.

99. Despite children hardly contracting and/or dying from COVID-19 prior to the release of the COVID-19 vaccine, DEFENDANT United States of America's government agencies have sought to mandate the COVID-19 vaccine to infants, children and teenagers.

100. It has been stated that DEFENDANTS Hochul, Adams and NYCDOE wanted to make the COVID-19 vaccine mandatory for all students to attend public schools in the City of New York.

**ii. Pushing Sex on Children**

101. America already has a serious problem with pedophilia and child trafficking.

102. In recent years, there have been an increasing amount of teachers who have been convicted of having sexual contact and/or sexually inappropriate relationships with students.

103. Having drag queens read to students.

104. On [insert date], a D75 school of DEFENDANT NYC DOE based in Long Island recently had a drag show for elementary students, many of whom were autistic,

105. The male teacher in drag who exposed his underwear to students is still employed by DEFENDANT NYCDOE.

III. Complaint Against the Department of Education, Equal Employment Opportunity, and the United Federation of Teachers. [Crimes Against Humanity; Genocide; Intentional Violations of Unalienable, Human, Constitutional and Civil Rights; Fraud; Violation of the Ku Klux Klan Act of 1871; Intentional Violations of Title VII, Section 1981, New York State Human Rights Law and New York City Human Rights Law; Obstruction of Justice; Unjust Enrichment]

A. Complaints Filed by PLAINTIFF Mr. Washington Post-Termination from P.S. 250

i. Complaint Filed with DEFENDANT United Federation of Teachers

106. The first complaint filed by PLAINTIFF Mr. Washington was with his union, DEFENDANT UFT, on August 5, 2021.

107. Procedural due process was violated at the Step 1 stage because the finder of fact never rendered a decision on the merits.

108. Without having the opportunity to appeal the Step 1 decision, PLAINTIFF Mr. Washington was made to reargue his claims to which the finder of fact made no mention of them in her Step 2 decision.

109. Pursuant to the UFT rules of procedure, PLAINTIFF Mr. Washington requested an arbitration, for the arbitrator to review not only the decisions of Amott, and DEFENDANT NYCDOE but DEFENDANT UFT as well.

110. On January 13, 2023, DEFENDANT Mark Collins, Director of DEFENDANT UFT's Grievance Department, submitted a letter to PLAINTIFF Mr. Washington

111. On January 19, 2023, PLAINTIFF Mr. Washington responded to the e-mail and letter of DEFENDANTS Herron and Collins. *See Exhibit B.*

112. On June 27, 2023, PLAINTIFF Mr. Washington had a conference call with various five UFT representatives.

113. Given that PLAINTIFF Mr. Washington's arguments were written in his appeal, he ultimately asked to conclude the call because DEFENDANT UFT's members were trying to decide the merits of his claims when that decision was for the arbitrator to review.

114. DEFENDANT UFT employees responsible for depriving PLAINTIFF Mr. Washington of his constitutional and civil rights include but are not limited to: Jeanie Santopietro, Mark Collins, Michael Herron,

115. Majority of the individuals named in paragraph \_\_\_\_ are classified as "white."

ii. Complaint Filed with DEFENDANT Department of Education

116. Background info on the Department of Education.

117. In order to ensure its public schools comply with our nation's civil rights laws, DEFENDANT DOE also contains the Office of Civil Rights ("OCR").

118. On September 2, 2021, PLAINTIFF Mr. Washington submitted his complaint to the DOE. *See Exhibit C.*

119. The case number assigned to the complaint is: Case No. 02-21-1273.

120. The Director of the New York office is Rachel Pomerantz.

121. At one point during the September 20, 2021 preliminary interview with DEFENDANT Lauren Numeroff, she asked PLAINTIFF Mr. Washington to explain to her how DEFENDANT NYCDOE's policies created a disparate impact against African Americans.

122. PLAINTIFF Mr. Washington followed up that phone call with an e-mail, summarizing the conversation and reiterating his point that pursuant to antidiscrimination law, one did not have to identify explicit policies that causes a disparate impact.

123. PLAINTIFF Mr. Washington wrote, in part: "Either way, Title VII is very clear that the requirement Lauren spoke of is not mandatory. 42 U.S.C. § 2000e-2(k)(1)(B)(i) states: 'With respect to demonstrating that a particular employment practice causes a disparate impact as described in subparagraph (A)(i), the complaining party shall demonstrate that each particular challenged employment practice causes a disparate impact, except that if the complaining party can demonstrate to the court that the elements of a respondent's decisionmaking process are not capable of separation for analysis, the decisionmaking process may be analyzed as one employment practice.'" *See Exhibit D.*

124. On January 19, 2022, PLAINTIFF Mr. Washington submitted his amended complaint, adding the additional claim that the COVID-19 vaccine mandates cause a disparate impact against African Americans. *See Exhibit E.*

125. In a March 8, 2022 e-mail, PLAINTIFF Mr. Washington wrote, in part, to DEFENDANT Numeroff: "You all have always been aware of this issue and have had DECADES to fix this historical problem and you didn't, so now, you're basically saying I have to wait for you all to figure out how you're not going to do anything? I don't have time for that. If you were going to do something, it would already been done because I've done most of the work for you and this racially segregated institution."

126. On August 22, 2022, PLAINTIFF Mr. Washington received the DOE's determination letter. *See Exhibit F.*

127. The OCR's determination letter was written and signed by Alexander H. Artz — Compliance Team Leader.

128. Artz summarized PLAINTIFF Mr. Washington's claims into three allegations.

129. Artz stated: "You alleged that staff at the NYCDOE's P.S. 250 (the School) discriminated against you on the bases of your race and sex by terminating your employment as a substitute teacher at the School in summer 2021 (Allegation 1). You further alleged that the NYCDOE discriminated on the bases of race, color, and/or national origin (Allegation 2) by (a) terminating your employment for not complying with the NYCDOE's mandate that employees receive the COVID-19 vaccine, and (b) implementing the COVID-19 vaccine mandate. Lastly, you alleged that the NYCDOE discriminates on the basis of race by engaging in practices that result in racial segregation and institutional racism (Allegation 3)."

130. Artz then stated: Based on the information you provided during a telephone call with OCR staff on September 20, 2021, and in emails to OCR dated September 20 and 30, 2021, and January 12 and 19, March 8 and 9, and June 16 and 17, 2022, OCR is dismissing Allegations 1-3 as explained below."

131. With respect to Allegation 1, Artz stated that the "OCR determined that Allegation 1 raises a claim of individual employment discrimination on the bases of race and sex" and with respect to Allegation 2(a), the OCR determined that it also "raise[d] a claim of individual employment discrimination on the bases of race, color, and/or national origin."

132. Artz stated that because DEFENDANT EEOC is "responsible for the investigation and conciliation of allegations of individual employment discrimination...", DEFENDANT DOE "referred Allegations 1 and 2(a)" to Hernan Morales — Supervisor, Charge Receipts and Technical Information Unit — based in New York.

133. With regards to Allegation 2(b), Artz stated: "In support of Allegation 2(b), you asserted that the mandate will have a disparate impact on African American students, teachers, and staff. You informed OCR that you and "[many of the teachers [you] worked with this year who were of color," refused to get vaccinated and are currently unemployed." You also made general assertions about the purported effects of the implementation of the NYCDOE's COVID-19 vaccination policy on the employment of Black teachers, citing statistics claiming that as of August 12, 2021, 28 percent of Black New Yorkers aged 18 to 44 were fully vaccinated, which was lower than the vaccination rates for other demographics. You did not provide information regarding the vaccination rates for Black teachers. While you have made general assertions about the potential impact that the COVID-19 vaccine mandate may have, the information you provided regarding vaccination rates does not indicate that the mandate has had a disparate impact on the NYCDOE's employment of African American teachers compared to other teachers, or that there have been any negative learning outcomes for African American students as a result. Therefore, your allegation that the NYCDOE discriminated on the bases of race, color, and/or national origin by implementing the mandate, fails to state a violation of one of the laws or regulations that OCR enforces. Accordingly, OCR is dismissing Allegation 2(b) pursuant to Section 108(f) of OCR's Case Processing Manual."

134. Artz knew that there was no way PLAINTIFF Mr. Washington would have access to that information and that the only party who did would be DEFENDANT NYCDOE.

135. DEFENDANT DOE refused to compel DEFENDANT NYCDOE to produce those documents.

136. With regards to Allegation 3, Artz stated: "With respect to Allegation 3, you alleged that the NYCDOE discriminates by engaging in practices that result in racial segregation and institutional racism. In support of Allegation 3, you made a number of general assertions. You asserted that the NYCDOE's "white-controlled educational system is inherently racist"; that "transformative reform is needed at the institutional and school-wide level, that in "a myriad number of ways," the NYCDOE's "educational system is setting African American

students, educators and administrators up for failure"; and that the policies, procedures and practices of NYCDOE schools "have a glaring disparate impact against African Americans - from students to educators to administrators."

137. In a similar pattern and practice, Artz dismissed Allegation 3 by stating: "While you have made general assertions about institutional racism, the NYCDOE, and the alleged discriminatory effects of its practices, you have not identified any specific decision, practice, or policy that you believe is currently discriminatory on the basis of race and/or how any specific alleged conduct is discriminatory on the basis of race. Therefore, OCR determined that Allegation 3 lacks sufficient factual detail for OCR to infer that discrimination may have occurred or is occurring. Accordingly, OCR is dismissing Allegation 3 under Section 108(d) of the Case Processing Manual, and your complaint, as of the date of this letter."

138. As stated to \_\_\_\_\_ and others at DEFENDANT NYCDOE, under the theory of disparate treatment, one does not have to identify specific policies, practice and procedures — the "effects" of those individual and/or cumulative discriminatory practices.

139. DEFENDANT DOE reached these conclusions without requiring DEFENDANT NYCDOE to respond to PLAINTIFF Mr. Washington's legitimate allegations.

140. The next day, on August 23, 2022, PLAINTIFF Mr. Washington filed his appeal, forwarding his detailed and thorough complaint that was filed with DEFENDANT EEOC on [insert date].

141. The appeal was decided by DEFENDANT DOE's Chicago Enforcement Office.

142. On [insert date], DEFENDANT DOE's Chicago Enforcement Office denied PLAINTIFF Mr. Washington appeal.

143. DEFENDANT DOE employees responsible for depriving PLAINTIFF Mr. Washington of his constitutional and civil rights include but are not limited to: Lauren Numeroff, Alexander Artz

144. Majority of the individuals named in paragraph \_\_\_\_ are classified as "white."

iii. Complaint Filed with DEFENDANT Equal Employment Opportunity Commission

145. Pursuant to Title VII, an individual who believes that they are a victim of discrimination or that their employer is discriminating against a person or class of persons because of their protected characteristic(s), they must first file a complaint with DEFENDANT EEOC if they wish to pursue their claims in state or federal court.

146. On [insert date], PLAINTIFF Mr. Washington filed his complaint with the EEOC.

147. The case number assigned to the complaint is: EEOC No. 520-2021-04229.

148. The only attempt made by DEFENDANT NYCDOE to respond to all of PLAINTIFF Mr. Washington's claims was before DEFENDANT EEOC.

149. DEFENDANT NYCDOE responded to PLAINTIFF Mr. Washington's claims for the first time in their [insert date] oppositional pleading to DEFENDANT EEOC.

150. DEFENDANT NYCDOE's oppositional pleading was written by and/or signed by DEFENDANT Liz Vladek.

151. DEFENDANT Vladek is a woman classified as "white."

152. Upon graduating with her law degree from \_\_\_\_\_ in \_\_\_\_\_, DEFENDANT Vladek moved to Russia and decided to use her knowledge of antidiscrimination law to help advocate for the freedoms and liberties of Russian people.

153. DEFENDANT Vladek was hired by DEFENDANT NYCDOE and the job was never made publicly available.

154. Prior to joining DEFENDANT NYCDOE, DEFENDANT Vladek worked under DEFENDANT DeBlasio's administration.

155. On May 31, 2022, PLAINTIFF Mr. Washington submitted his Reply, demonstrating why DEFENDANTS NYCDOE and Vladek's oppositional pleading did not meet its heightened burden of production and persuasion, showed why their arguments were pretextual and supported a finding in favor of PLAINTIFF Mr. Washington. *See Exhibit G.*

156. In response, DEFENDANT EEOC abruptly decided to transfer PLAINTIFF Mr. Washington's case to their Florida branch.

157. PLAINTIFF Mr. Washington objected to the transfer because he'd dealt with DEFENDANT EEOC's Florida branch and they engaged in fraud to narrow his mother's claims of discrimination, which later worked against her in federal court.

158. On [insert date], DEFENDANT EEOC's Florida branch transferred PLAINTIFF Mr. Washington's complaint to the Indianapolis district office.

159. On May 8, 2023, Michelle Ware – Enforcement Manager –

160. On May 9, 2023, PLAINTIFF Mr. Washington submitted his appeal to the EEOC. *See Exhibit H.*

161. DEFENDANT EEOC employees responsible for depriving PLAINTIFF Mr. Washington of his constitutional and civil rights include but are not limited to: Michelle Ware, Richard Buckley, Jeffrey Burstein, Arlean Nieto, Charolette Burrows, Frederick Brubaker

162. Majority of the individuals named in paragraph \_\_\_\_ are classified as "white."

**B. DEFENDANT NYCDOE and Vladek's Failure to Meet Heightened Burden of Production and Persuasion**

**i. Systemic Disparate Treatment**

163. DEFENDANTS NYCDOE and Vladek ignored this aspect of PLAINTIFF Mr. Washington's claims and failed to refute any of the evidence used to establish these claims, as well as his claims of pre-hiring individual disparate treatment.

**ii. Systemic Disparate Impact**

**a) License Requirement**

164. \_\_\_\_\_

b) COVID-19 Mandates

165. \_\_\_\_\_

iii. Individual Disparate Treatment

166. \_\_\_\_\_

C. PLAINTIFF Mr. Washington Establishes Pretext

167. Mr. Washington's [insert date] Reply to DEFENDANT NYCDOE's oppositional pleading sufficiently argued why DEFENDANTS NYCDOE and Vladek's pleading warranted a judgment in favor of PLAINTIFF Mr. Washington.

i. "At Will" or "Per Diem" Employment

168. "At Will" or "Per Diem" Is not a legitimate legal defense to claims of systemic disparate treatment, systemic disparate impact or pre and post-hiring individual disparate treatment claims of discrimination

ii. Violation of Agreements

169. Earlier this year, PLAINTIFF Mr. Washington had the opportunity to read the two relevant agreements entered into between DEFENDANTS NYCDOE and UFT — NAME THEM.

170. Both of these contracts further support that Amott violated PLAINTIFF Mr. Washington's right to due process when she terminated him without informing him of what he did wrong and never allowed him the opportunity to defend himself.

iii. Investigation Into PLAINTIFF Mr. Washington Was Abruptly Cancelled by DEFENDANT NYCDOE

171. In response, DEFENDANT EEOC abruptly decided to transfer PLAINTIFF Mr. Washington's case to their Florida branch.

iv. PLAINTIFF Mr. Washington was Terminated Shortly After Raising Complaints That Adults and Interns in Classroom Were Excessively Using Their Cellphones During Class Hours

172. E-mails showing PLAINTIFF Mr. Washington raising complaints to Amott about cellphone usage of paid employees and interns during class hours. ~~See~~ Exhibit I.

173. In addition to e-mailing Budhu, PLAINTIFF Mr. Washington also spoke to Rosecindy and e-mailed Amott the morning of the day he was terminated.

174. Had PLAINTIFF Mr. Washington used his phone during class instead of teaching, he would have been terminated.

175. Had PLAINTIFF Mr. Washington been "white," Amott would have remained impartial and followed the procedures for investigating claims against teachers per the \_\_\_\_\_ and \_\_\_\_\_ Agreements.



v. Reasons Proffered by DEFENDANT NYCODE for PLAINTIFF Mr. Washington's Termination Has Changed Over Time

176. Pretext is further established due to the fact that on a recent conference with DEFENDANT UFT on June 27, 2023, a representative for DEFENDANT NYCDOE argued for the first time PLAINTIFF Mr. Washington had been terminated due to "verbal abuse."

177. It is well settled that "corporeal punishment" and "verbal abuse" are not the same.

vi. COVID-19

178. \_\_\_\_\_

D. Ethical Violations of DEFENDANT Vladek

179. DEFENDANT Vladek advanced legal arguments that she would never make had claims involved so-called race and/or sex discrimination against people classified as "white."

180. DEFENDANT Vladek's actions also constitute intentional violations under New York Judiciary Law \_\_\_\_ 487.

181. Pursuant to the New York Rules of Professional Conduct, DEFENDANT Vladek

E. Failure of DEFENDANTS NYCDOE, UFT, DOE and EEOC To Investigate Complaint Constitutes Negligence, Conspiracy, Fraud and Obstruction of Justice

182. All institutions overseeing PLAINTIFF Mr. Washington's complaint are engaging in a race-based conspiracy to all public schools throughout the U.S. to maintain racial segregation in violation of Brown, Title VII and additional civil and human rights laws.

183. Both DEFENDANTS DOE and EEOC are federal government agencies and their employees take an oath to uphold and enforce not only the U.S. Constitution, but our nation's federal antidiscrimination statutes.

184. DEFENDANT EEOC's Systemic Disparate Treatment Initiative.

185. Despite this initiative, racial discrimination, particularly in the area of employment, continues to be widespread and pervasive.

186. On two separate occasions, DEFENDANT EEOC have failed to intervene and investigate claims of discrimination against historically racist and racially segregated industries and/or businesses that PLAINTIFF Mr. Washington has been employed by.

187. Ignoring claims of racial discrimination is a form of racial discrimination.

188. DEFENDANTS NYCDOE, DOE, UFT, and EEOC claim to be non-racist and equal opportunity employers while maintaining racially segregated workplaces.

F. DEFENDANT NYCDOE's Refusal to Produce Documents or Comply with PLAINTIFF Mr. Washington's FOIL Request

189. Since DEFENDANT NYCDOE refused to provide any evidence to refute PLAINTIFF Mr. Washington's claims of systemic disparate treatment, systemic disparate impact and pre-hiring individual disparate treatment, while simultaneously denying all claims

of discrimination, PLAINTIFF Mr. Washington began to submit FOIL requests to DEFENDANT NYCDOE to compel them to produce pertinent documents solely in their possession.

190. Over the course of eight months, PLAINTIFF Mr. Washington submitted 44 FOIL requests to DEFENDANT NYCDOE. See Exhibit J.

191. To this date, DEFENDANT NYCDOE has complied with less than 5 of those requests.

**G. Harmful Delays Caused by DEFENDANTS UFT, DOE AND EEOC'S Violations of Due Process Have Caused PLAINTIFF Mr. Washington Irreparable Harm**

192. Two years have passed since PLAINTIFF Mr. Washington filed his first complaint against P.S. 250 and no institution reviewing the complaint has been able to render an impartial decision addressing and resolving each claim presented.

193. Given that PLAINTIFF Mr. Washington went over and beyond his burden of proof to prove each one of his claims, DEFENDANTS NYCDOE and Vladeck failed to meet their heightened burden of production and persuasion and PLAINTIFF Mr. Washington demonstrated that their arguments were pretextual, DEFENDANTS UFT, DOE and the EEOC should have rendered an ethical and objective decision in favor of PLAINTIFF Mr. Washington.

194. According to the decisions of DEFENDANTS UFT, DOE and EEOC, no amount of evidence will find DEFENDANT NYCDOE of violating Title VII and additional human rights laws.

**H. DEFENDANTS UFT, DOE, NYCDOE and EEOC Are Being Unjustly Enriched From Maintaining Racism and Racial Inequality**

195. DEFENDANTS DOE, EEOC and NYCDOE are receiving federal funds, paid by taxpayers, to maintain racism and racial inequality throughout the DEFENDANT United States of America.

196. Based on projections, DEFENDANT NYCDOE expected to receive a stimulus budget of \$2 billion and a total budget of \$37.7 billion for FY 2023.

197. According to the Office of the New York State Comptroller, "The Department of Education received additional City funding for new needs of \$442 million for FY 2024, predominantly to fund known costs for charter schools and student transportation which OSC had previously identified as risks to the financial plan."

198. In DEFENDANT BIDEN's 2023 Budget, he proposed \$464.65 million for DEFENDANT EEOC, including \$31.5 million for state, local, and tribal programs. This represents a 10.6% increase over the 2022 enacted level.

199. In FY 2023, DEFENDANT Department of Education had \$194.55 Billion distributed among its 10 sub-components.

200. In the agreements between DEFENDANTS UFT and NYCDOE, it contains anti-discrimination language.

IV. Complaint Against City of New York, State of New York and the United States of America [Crimes Against Humanity; Genocide; Intentional Violations of Unalienable, Human, Constitutional and Civil Rights; Fraud; Violation of the Ku Klux Klan Act of 1871; Intentional Violations of Title VII, Section 1981, New York State Human Rights Law and New York City Human Rights Law; Obstruction of Justice; Unjust Enrichment]

A. State and City of New York

201. On two separate occasions, DEFENDANT EEOC have failed to intervene and investigate claims of discrimination against historically racist and racially segregated industries and/or businesses that PLAINTIFF Mr. Washington has been employed by.

202. Human rights violations committed by DEFENDANTS Cuomo, Hochul, DeBlasio and Adams maintaining a racial caste system throughout the State and City of New York, as well as their response to the man-made COVID-19 "pandemic."

B. United States of America

203. The U.S. government bears the ultimate responsibility for creating the conditions which allow for democracy and equality to thrive.

204. Franz Boas and the role of culture.

205. DEFENDANT United States of America's government is currently engaged in a silent war against its own citizens, as well as people around the world, in an effort to depopulate the planet.

206. Operation Paperclip during the late 1940s and 1950s, which allowed Nazis to infiltrate the U.S. government.

207. Involved in the assassinations of African American civil and human rights leaders like Dr. Martin Luther King, Jr., Malcolm X and Fred Hampton to name a few.

208. DEFENDANT United States of America's government is actively tainting the water, air and food supplies.

209. As detailed in Robert F. Kennedy, Jr.'s book, *The Real Anthony Fauci*, this was not DEFENDANTS NIH, NIAID, Fauci, Gates and BMGF's first time planning a "pandemic" caused by a virus.

210. Trying to economically castrate us all, which will effect those at the bottom of America's racial caste system the fastest.

211. Inflation is caused by increases to the money supply.

212. DEFENDANT United States of America's dollar has no real value.

i. A Quest To Achieve A "New World Order"

213. Most American citizens are not taught and many do not know, that since the "founding" this this country, many of its "white"-male public officials in government have been and/or are members of secret societies such as the Freemasons, Illuminati and Yale's Skull & Bones, as well as globalist organizations like the Bilderberg Group, the Trilateral Commission and the World Economic Forum.

214. For more than three hundred years, secret societies like the Freemasons and Illuminati have been trying to establish a "new world order."

215. Presidents including but not limited to George W. Bush, Bill Clinton Barack Obama and Joe Biden are pro-vaccine and we're involved in the campaign to achieve mass vaccination by being allegedly vaccinated with the COVID-19 vaccine in public.

216. Although government officials takes an oath to uphold the U.S. Constitution, the loyalty of those individuals who are members of these secret society is not to the American people.

217. During the first year of the "pandemic," PLAINTIFF Mr. Washington did extensive research into the origins of the COVID-19 virus and learned that DEFENDANT United States of America's government conspired with the government of China to conduct gain-of-function research to make coronavirus deadlier in humans.

218. In the same way the U.S. government lied about the biological reality of race, it has also lied about its role in creating COVID-19 and orchestrating the global "pandemic."

219. DEFENDANT United States of America and its government has the responsibility of protecting people from harmful events, but from the pyramid of evidence present below, it is without question that various local, state and/or federal governments throughout the United States of America have planned these events with the goal of depopulating the nation and ushering in a "new world order."

ii. Refusal to Provide Reparations to Descendants of African Slaves and African American Community

220. History of African Americans seeking reparations.

221. Refusal to pass H.R. 40 since the 1980s when this bill is only meant to study the effects of slavery and Jim Crow semi-slavery.

222. It is estimated by some scholars that DEFENDANT United States of America owes descendants of African slaves more than \$6 quadrillion dollars.

223. DEFENDANT United States of America is currently more than \$32 trillion and it doesn't have the money to pay its debts.

iii. "Conservative Judicial Agenda"

224. Ronald Reagan ushered what is referred to as the "conservative judicial agenda" during his eight years in office beginning in 1980.

225. Reagan and the Republican Party filled the judiciary with predominately "white" male, ideologically conservative Article III federal judges to lifelong appointments on the bench.

226. Reagan's goal was achieved during the presidency of DEFENDANT Donald Trump.

227. In the last decade, DEFENDANT United States of America and/or its states have sought to repeal key portions of the Voting Rights Act of 1965, have banned the teaching of "critical race theory," the Supreme Court deemed the use of affirmative action in college admissions unconstitutional on June 29, 2023 and on July 8, 2023, an Oklahoma judge named Caroline Wall dismissed with prejudice the lawsuit of the three surviving members of the 1921 Tulsa Race Massacre, arguing that being connected to a historical event doesn't give a person unlimited rights to seek compensation.

228. DEFENDANT Wall has described herself as a "Constitutional Conservative" in past campaign questionnaires.

229. While DEFENDANT United States of America has denied reparations to black Americans from crimes it has committed against them, they have, in the last year, given the Ukrainians more than \$70 billion in aid for a war they were involved in creating against Russia.

iv. Transgenerational, Epigenetic Effects of Slavery, Jim Crow Semi-Slavery and On-Going Racism on African Americans Present Day

230. Kenneth Nave's book.

v. Government Is Tyrannical and Must Be Abolished

231. America's tyrannical government has intentionally failed its citizens.

232. President's approval rating.

233. Had reparations been paid at some point in the past to descendants of African slaves, the U.S. would not be in the state of crisis that it is today.

234. Due to the U.S. government's direct actions and policies, the life expectancy of U.S. citizens has decreased the last two years.

235. Their goal is to bring Communism and/or Socialism, as originally envisioned by Freemasons like Karl Marx and other individuals, to the U.S.

236. Individuals like DEFENDANT Bill Gates believes that the world, especially Africa, is overpopulated and have used vaccines to help with "family planning" — a euphemism for depopulation.

237. DEFENDANT Gates is using his billions of dollars to fund projects that are inhumane and will continue to give him monopolistic control over land and its resources.

238. For example, both the U.S. government and DEFENDANT Gates have recently been involved in projects meant to block out the sun.

239. The sun is vital to life so any attempts to lock out the sun is a threat to all living things inhabiting this planet, including the Earth.

240. DEFENDANTS Gates and BMGF, have funded and continue to fund projects that genetically alter mosquitoes and allow them to vaccinate humans.

241. DEFENDANT Gates has already alluded to the fact that there will be more virus causing "pandemics" in the near future.

242. A new "war game" has already begun, in which various decision makers from key industries, discuss and strategize who to respond to a viral outbreak.

243. Artificial intelligence and transhumanism.

244. Agendas 2030 and 2050.

**V. Demands for Relief**

PLAINTIFF Mr. Washington sought to resolve this matter without the intervention of the courts, but instead, DEFENDANT NYCDOE enlisted a recently hired attorney to advance frivolous and legally insufficient arguments on their behalf.

WHEREFORE, the PLAINTIFF prays that the Court enters a judgment in his favor against each Defendant, containing the following relief, including but not limited to:

**A. Immediate Relief**

- Declaratory relief finding that DEFENDANTS UFT, EEOC and the DOE conspired to improperly and partially investigate PLAINTIFF Mr. Washington's complaint and as a result, violated his constitutional rights to due process and equal protection under the law.
- Strengthen Title VII and other federal, state and local antidiscrimination statutes.
- Redistribution of wealth, land and power in this country between "whites" and people of African descent.
- Desegregate all public schools throughout the U.S., or in the alternative, 20 percent of DEFENDANT DOE's annual budget must go to the African American community for the creation and development of black-owned schools throughout all 50 states.
- Vacate all decisions rendered by DEFENDANTS Patterson and Castel in the Rowe and Washington Litigations against DEFENDANT William Morris and grant default judgment in favor of PLAINTIFF Mr. Washington and the class of black concert promoters.
- A monetary judgment against DEFENDANT William Morris for discriminating against Mr. Washington and intentional violations of federal, state and local antidiscrimination law no less than \$250 million dollars (paid in gold).
- Removing the procedural requirement of first filing complaints with DEFENDANT EEOC before filing a complaint in state or federal court.
- Release the unredacted flight logs of Jeffrey Epstein and make them publicly available no later than September 1, 2023.
- Impeaching all elected government leaders who are members of secret societies such as the Freemasons and Illuminati, and/or members or affiliates of globalist organizations such as the Trilateral Commission, the Bilderberg Group and the World Economic Forum to name a few.
- Terminate DEFENDANT Vladeck from DEFENDANT NYCDOE.
- A monetary judgment against DEFENDANTS DOE, UFT and EEOC in an amount no less than \$10 million each (paid in gold) for violating and depriving PLAINTIFF Mr. Washington of his constitutional rights to due process and equal protection under the law.

**B. Post-Litigation Relief**

- Per the instructions set for in the U.S. Constitution, significantly alter and/or abolish the existing white-controlled government and banning people classified as "white" from having a monopoly over any industry in our ethnically diverse society, including but not limited to government.

i. **Declaratory:**

- Finding that DEFENDANT United States of America have committed genocide and other egregious crimes against people of African descent spanning more than four hundred years and are still on-going.
- Finding that PLAINTIFF Mr. Washington and African Americans as a class have and are being discriminated against by DEFENDANT NYC DOE in the terms and conditions of their employment in comparison to their similarly situated "white," Latino and Asian counterparts.
- Finding that DEFENDANT NYCDOE is intentionally violating Brown v. Board of Education and Title VII with malice and/or reckless indifference to the federally protected rights of African Americans.
- Finding that "race" is not a biological reality and banning the classification of citizens based on this arbitrary social and legal construct.

ii. **Injunctive:**

iii. **Affirmative:**

- Imposing affirmative action and quotas for college admissions and in the area of employment.
- Banning legacy admissions from all colleges and universities.

iv. **Monetary:**

- Significantly defunding DEFENDANTS NIH, NIAID, CIA, FBI, and EEOC.
- A monetary judgment against the United States of America in an amount no less than \$44 QUADRILLION dollars (paid in gold).
- Backpay and other monetary damages, including substantial compensatory damages, for all DEFENDANT State and City of New York employees, including DEFENDANT NYCDOE, who were wrongfully terminated for refusing the COVID-19 vaccine.
- Freeze all of DEFENDANT Bill Gates and BMGF's financial accounts, arrest Bill and Melinda Gates and distribute their wealth to nations around the world for their social and spiritual uplift.

I submit this Complaint in good faith and will have to amend due to my laptop crashing two days before the filing deadline. I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Dated: New York, New York  
July 10, 2023

Respectfully submitted,

By:   
\_\_\_\_\_  
Marcus Washington

54 Boerum St. Apt. 6M  
Brooklyn, NY 11206  
(646) 504-6497  
humanrights.isamust@gmail.com